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August 17, 2017

Objection Reviewing Officer
USDA Forest Service, Northern Region
26 Fort Missoula Road
Missoula, MT 59807
Submitted to: appeals-northern-regional-office@fs.fed.us
Subject: Rock Creek Project Objection

Dear Objection reviewing officer:

On behalf of Montana Wilderness Association and our more than 5,500 members, we thank you for the opportunity to submit objection comments for the Final SEIS and Draft ROD for the Rock Creek project. Our members continue to remain concerned over the impact to environmental values, wilderness character, and cumulative effects associated with this project. The impact on the remarkable Cabinet Mountains Wilderness (CMW) remains a serious concern.

We understand the approximate 35-year economic benefit this project has for rural communities in NW Montana. However, it is difficult to believe that the impacts and development of two mines—Rock Creek and Montanore—with the slender and remarkable CMW between will have no significant impact and can be adequately mitigated. We challenge the notion that innovation plus mitigation is always the way out of environmental degradation. While we recognize humans have learned a lot in this regard, we also see clearly that we are often unable to adequately develop resources without unforeseen repercussions, sometimes that are far outside our control or understanding. We continue to believe that some places are too special to warrant the resounding risk involved.

The final SEIS reiterates that Phase I includes the evaluation adit construction, development, and data collection. Phase II would be actual mine construction, operation, and reclamation. We recognize that plans for Phase II are highly tied to Phase I, nevertheless our concerns remain.

The effects on Wilderness character may be indirect and variable, and the draft SEIS outlines several uncertainties that warrant concern. If compounded these *potential* impacts will result in tangible affects that will not be satisfied through mitigation, but instead will forever change the CMW and surrounding resources. To demonstrate our concern and the overwhelming likelihood for negative cumulative effects, the following text was taken from the draft SEIS:

- Hydrologic effects would include changes in water availability and water quality (S-18)
- Discharges from the wastewater treatment plant would increase the flow of the Clark Fork River (S-20)
- The 3D model indicated that St. Paul Lake may be affected by mine dewatering, but the effects may be difficult to separate from the large natural lake level fluctuations (S-20)
- The Rock Creek Paste Tailings Seepage Model predicted that nitrate would have the largest relative increases in concentration. Other parameters with predicted concentration increases are sodium, potassium, chloride, sulfate, ammonia, and aluminum (S-20)

- Groundwater and surface water depletions at mine build out may reduce the quantity and quality of aquatic habitat in streams throughout the study area including streams supporting bull trout and designated bull trout critical habitat (S-22)
- Indirect effects on the untrammeled qualities of the CMW could result from direct effects on natural systems, such as hydrology, within or adjacent to the wilderness.
- Alternative V has the potential to indirectly affect wilderness qualities (4-99)
- Short-term mine construction and operation may result in aesthetic impacts on visitors from some locations within the CMW and IRAs. Aesthetic impacts would be long-term where disturbed areas, such as the air-intake ventilation adit, mill site, or paste tailings facility, were visible (4-213)

Given this information, which isn't necessarily an exhaustive list, we have grave doubts that when compounded these impacts can be mitigated, or will be indirect or insignificant as claimed.

We, furthermore, do not have confidence that the Kootenai National Forest holds the resources or integrated management for the CMW that would identify and quickly address potential impacts to Wilderness character. For example, it is inevitable that mining operations will alter visitation and experiences within the CMW by changing the patterns of use and perceptions around Rock Creek and the surrounding Wilderness lakes but again resources for monitoring and adaptive management actions are highly limited.

In conclusion, we remain concerned about potential pollution to the watershed, as well as the impacts to streams and lakes including temperature and sedimentation increases, water quality and quantity, fisheries and endangered and threatened species. We appreciate this opportunity to share our ongoing concerns. Please contact me with any questions.

Sincerely,

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